

**Federal Defenders
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July 29, 2020

By ECF

Honorable Laura Taylor Swain
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

Re: *United States v. Martinez-Aguilar, et al*, 20 Cr. 333 (LTS)

Dear Judge Swain:

I represent defendant Sebastian Ramos in the above-captioned case.

The Government has submitted a letter motion and proposed protective order – Dkt. No. 24 – and I write to respectfully request the opportunity to respond on the grounds that the proposed order is overbroad. I respectfully request that the Court set July 30, 2020 as the deadline for my response. The Government – per Assistant U.S. Attorney Jarrod Schaeffer – does not object to the filing of the response or the proposed schedule.

Thank you for your consideration of this request.

Respectfully submitted,

The request for leave to file a response
on July 30, 2020, is granted. DE# 25
resolved.

SO ORDERED.

7/29/2020

/s/ Laura Taylor Swain, USDJ

/s/

Martin S. Cohen
Ass't Federal Defender
(212) 417-8737

Cc: Jarrod Schaeffer and Rushmi Bhaskaran Esqs., by ECF